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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)

Closed Captioning and Video)
Description of Video Programming)

MM Docket No. ~~95-484~~

95-176

To: The Commission

REPLY COMMENTS OF HOME BOX OFFICE

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To: The Commission

Home Box Office ("HBO"), a division of Time Warner Entertainment Company, L.P. ("TWE"), by its attorneys, hereby submits its reply to the comments filed in response to the Commission's Notice of Inquiry in the above-captioned proceeding.¹

HBO believes, and the record in this proceeding demonstrates, that, without governmental requirements of any kind, video programming providers have "responded overwhelmingly to the challenge of providing greater access to

1 Notice of Inquiry in MM Docket No. 95-176, FCC 95-484 (released December 4, 1995) ("NOI"). On February 27, 1996, the Commission released a follow-up order, FCC 96-71, clarifying that the NOI would address closed captioning and video description issues raised by Section 305 of the Telecommunications Act of 1996, Pub. L. 104-104, 110 Stat. 56 (1996) ("Act").

the television medium for people with hearing and visual disabilities."² More specifically, great strides have been made in recent years in affording disabled Americans increased access to programming through closed captioning.

In its initial comments in this proceeding, HBO described its strong commitment to closed captioning.³ To summarize, HBO is a leading supplier of pay television programming in the United States, including the premium programming services HBO and Cinemax. The vast majority of programming offered to HBO and Cinemax subscribers is closed captioned. In 1995, almost 80% of the full programming schedule on the HBO network was captioned and 95% of the prime time schedule was captioned. For Cinemax, approximately 52% of the full schedule and 69% of the prime time schedule was captioned in 1995. Last year, HBO established its own internal closed captioning department with the goal of captioning more HBO programming. Virtually all of the captioning done by HBO is paid for by the Company.⁴

² Comments of Motion Picture Association of America ("MPAA") at 1.

³ A number of comments in this proceeding recognize HBO's commitment to closed captioning. See, e.g., Comments of Association of Late-Deafened Adults at 4.

⁴ At footnote 8 of its initial comments, HBO stated that, in 1995, only 8 percent of its total programming hours qualified for government grants for closed captioning. The number actually should be 3 percent.

The record demonstrates that, like HBO, the majority of video programmers have responded to the demands of the marketplace by captioning a significant amount of programming. The total number of captioned programs aired on cable systems has dramatically increased every year.⁵ Similarly, seventy-five percent of broadcast network programming, including virtually all of prime time and children's programming is closed captioned.⁶ These advances have been made without burdensome regulation, and in response to increased competition and consumer demand.

A number of commenters in this proceeding eloquently describe how closed captioning affords individuals who are hearing impaired access to information and entertainment programming, the benefits of which might otherwise be

⁵ See Comments of National Cable Television Association at 4-5 ("over 30,000 hours per year of closed captioning [is] provided by the top 20 basic networks and the top six premium networks"); Comments of the Association for Late-Deafened Adults ("ALDA") at 4. As ALDA, WGBH and others point out, the overall percentage of programming captioned on cable channels is somewhat less than for the broadcast networks, primarily because of the recent and rapid proliferation of cable networks and cable shows. Comments of ALDA at 4; Comments of WGBH at 8.

⁶ See Comments of MPAA at 4; see also Comments of ABC/CapCities at 5 ("substantial majority of ABC network programs are closed-captioned, with exception of overnight news and live regionalized sports"); Comments of NBC, Inc. (all but three regularly scheduled programs are closed captioned); Comments of CBS, Inc. (virtually all of the network's programming, with the single exception of its overnight news programming, is captioned).

unavailable to them.⁷ While HBO does not disagree that closed captioning is a beneficial service for some, HBO does disagree with the logic of those commenters who hastily conclude that because closed captioning is "good," all programming should be closed captioned.

Maximizing access to programming for the hearing impaired is a legitimate goal, and one which HBO has expended considerable resources to achieve. Unequivocally mandating 100% access to all types of programming, suggested by certain advocates for the hearing impaired, however, is neither a legitimate nor a realistic goal. In fact, as demonstrated below, such a requirement portends ramifications inconsistent with Congressional intent and Commission policy as a whole. HBO urges the Commission, in establishing any regulatory scheme pertinent to closed captioning, therefore, to balance carefully the benefits of increased accessibility against the economic realities faced by those who will bear the responsibility for meeting closed captioning requirements and the impact of these economic realities on other consumers.

The Commission should allow market incentives to continue to guide the development of closed captioned programming, and forbear from imposing any obligations which intrude on the natural workings of the marketplace for video

⁷ See generally Comments of the National Association of the Deaf, Comments of the Jewish Deaf Congress, Comments of Self Help for the Hard of Hearing ("SHHH").

programming. Should the Commission adopt mandatory captioning requirements, it should exempt previously published programming, interstitial and live programming. Moreover, because premium services constitute discriminatory consumer purchases and face stiff competition from other premium services, home video, pay-per-view, etc., these services should be exempt from any mandatory captioning rules. Finally, the record clearly evidences that any regulatory scheme mandating video description services at this time would be premature.

II. CLOSED CAPTIONING

A. The Commission Should Not Intrude on the Workings of the Marketplace in Regulating Closed Captioning

Given the success of the marketplace in increasing the accessibility of television programming to all Americans and the practical and economic impediments faced by video programmers in implementing closed captioning, the Commission's rules adopted pursuant to the Telecommunications Act of 1996 should afford video programmers wide latitude in determining what types of programming will be captioned and when. It is clear from the record that marketplace forces are working, and the video programming industry is responding to competition and consumer demand by increasing the quantity and quality of closed captioned programming, negating the need for onerous regulation.

**1. No Justification Exists for Mandating
that All Programming Aired By Premium
Services Be Closed Captioned**

A number of commenters in this proceeding urge that premium programmers be required to caption 100% of their programming within 90 days of the effective date of any rules adopted by the Commission concerning closed captioning.⁸ This suggestion is completely unrealistic and ignores the cost/benefit analysis contemplated by Congress in implementing those provisions of the Telecommunications Act concerning closed captioning.⁹

As a preliminary matter, any suggestion that premium cable services should be singled out and subject to a 100% captioning mandate on an expedited basis is without justification. To the contrary, in light of a demonstrated commitment to closed captioning and the competitive marketplace forces that have compelled and will continue to compel premium services to provide captioning, these

⁸ See, e.g., Comments of SHHH at 9; Comments of Jewish Deaf Congress at 5-6; Comments of Consumer Action Network at 17-18.

⁹ The Act specifically provides an exemption for "programs, classes of programs, or services for which the Commission has determined that the provision of closed captioning would be economically burdensome to the provider" or result in an "undue burden." Section 713(d).

services should be exempt from any mandatory captioning requirements.¹⁰

Those parties who would mandate that all programming aired by premium services be captioned within three months imply that because premium channels are subscription services, any viewer who pays for the service should be entitled to 100% access.¹¹ This logic is not consistent, however, with the way premium channels are marketed to and purchased by consumers.

HBO does not expect every subscriber to its services to be attracted to every program HBO offers. To the contrary, HBO strives to provide a schedule of programming that will appeal to a broad diversity of viewers. In this manner, even though few, if any, subscribers enjoy all of HBO's programming, each subscriber feels (as evidenced by continued monthly payments) that the programming on the HBO services that he or she selects provides adequate value for the price paid for the services. HBO approaches its captioning activities with the same programming philosophy. In other words, HBO prioritizes its closed captioning resources to create a schedule of closed captioned programs

¹⁰ Comments of ALDA at 4 ("The premium cable networks have a greater commitment toward captioning than do others").

¹¹ See, e.g., Comments of National Association of the Deaf at 35-36 ("failure to have complete freedom to choose their shows has amounted to a stringent form of censorship").

that is likely to add to the audience diversity by attracting the largest number of deaf and hard-of-hearing viewers.¹² It is unrealistic, therefore, to suggest that every HBO program must be captioned in order to offer a hearing impaired individual fair value for his or her subscription payment.

A requirement that 100 percent of premium programming be captioned within a short period of time would, in fact, seriously undermine the program diversity that services such as HBO and Cinemax seek to achieve. As discussed below, notwithstanding economic considerations, it simply would be impossible to accomplish the task of captioning all previously published material in a short time frame. Thus, if the Commission were to heed the arguments of some and mandate that premium services only provide programming that is captioned, much of the non-captioned library material that is enjoyed by small numbers of viewers simply might not be presented. Thus, instead of a program schedule characterized by diversity, premium services would be forced to increase the number of repeats of captioned programs and offer only those titles that already have been captioned or that can be captioned, given the limited resources available and the time allowed. This approach would not maximize the

¹² As noted above, almost all of the HBO programming (95%), and a significant amount of Cinemax programming (69%), that is aired in prime-time, the daypart with the largest viewership, is closed captioned.

overall consumer enjoyment of HBO and Cinemax and other premium services.

The Electronic Industries Association ("EIA"), while supporting HBO's basic position that the Commission should intervene only where the market has demonstrably failed to provide captioning enhancements, questions whether cable programmers are subject to the same marketplace incentives as broadcasters, and therefore suggests that cable programmers may need additional incentives, i.e., regulations, to foster the provision of closed captioning.¹³ Because broadcasters rely on advertisers and ratings, EIA argues, broadcasters will suffer direct negative economic consequences where programming is inaccessible to disabled audiences.¹⁴ According to EIA, pay cable programmers do not rely on ratings, and therefore may not have the same incentive to caption programming.¹⁵

This argument ignores the fact that premium services operate in a highly competitive marketplace and rely on subscriptions. Because consumers make a direct election to subscribe to a premium service, on a per-channel rather than on a package basis, the number of subscribers a premium service has is, in effect, a more accurate representation of consumer demand than are, for example, advertising revenues

¹³ Comments of the Electronic Industries Association at 6.

¹⁴ Id.

¹⁵ Id.

generated by a network program. Moreover, because of this direct election, premium services will respond more quickly to the marketplace. If premium services are inaccessible to a large number of subscribers, the negative economic consequences to premium services providers would be similar to, if not more acute than, those for the broadcaster, i.e., decreased viewers and diminished revenues.

HBO reiterates its belief that premium services, both pay-per-channel and pay-per-view, should be exempt from any mandatory closed captioning requirements the Commission may adopt. Premium services compete with each other to attract viewers to watch, in many cases, the same programming titles. Thus, the natural competitiveness of these services will compel them to offer enhancements, including captioning, to attract as many viewers as possible. Finally, premium services clearly are discretionary entertainment services. Consumers generally make a monthly decision to purchase or not to purchase. If premium services do not provide sufficient value to subscribers, including deaf and hard-of-hearing subscribers, subscribers simply will not make the purchase.

2. Closed Captioning Must Be Permitted To Evolve Within A Reasonable Time Frame

Not only is the suggestion that premium cable services be required to caption all of their programming within 90 days unjustified, it is impossible to implement. For example, even though HBO captions the vast majority of its

programming, in 1995, 1,884 hours of programming which aired on HBO and Cinemax (excluding repeats) was not closed captioned. To provide quality captioning of one hour of previously published programming generally requires approximately 20 man hours. Based on these requirements, it would take HBO's in-house captioning department six years to caption the uncaptioned titles that aired on HBO and Cinemax during 1995. This estimate assumes a static library, and would allow HBO's captioners no time to work on more popular programming that clearly would be of greater interest to a majority of deaf or hard-of-hearing viewers.

Accordingly, the 90-day requirement proposed by some commenters (or any other requirement that previously published programming be captioned within a short amount of time) could not possibly be implemented. Such a requirement would simply lead to a loss of program diversity as services would have no choice but to increase the repeats of already captioned materials and drop the great majority of non-captioned programming from their schedules.

B. Should The Commission Adopt Mandatory Closed Captioning Requirements, Certain Programming Should Be Classified As Exempt

1. Previously Published Programming

The example cited above is illustrative of several of the difficulties faced by video programmers and the realities that must be considered in formulating any closed captioning requirements, not only for premium cable

programmers but also for all providers of video programming. Of particular concern is any requirement that would require closed captioning of library material. HBO concurs with the comments of MPAA, which suggests that "there is no justification for broad requirements mandating either the closed captioning or video description of all previously released programs."¹⁶

As HBO explained in its initial comments in this proceeding, it is primarily the older, previously released movie titles in the library of HBO's Cinemax service that are not closed captioned. These titles generally are shown in non-prime time hours, when viewership is very low. Because HBO does not have the capability to caption all of its programming, it allocates resources to captioning the programming that will be watched by most consumers, including deaf and hard-of-hearing consumers. As a result, the great majority of non-captioned product aired on HBO and Cinemax is scheduled in low viewing hours, i.e., non-prime time.

As the MPAA states, retroactive requirements would be impractical and expensive, requiring the captioning of libraries that may contain thousands of titles. Given the need to pass through these costs, it is clear that broadcasters and other video programming providers would simply not purchase these older non-captioned programs,

¹⁶ Comments of MPAA at 11.

resulting in reduced diversity of programming products available to the public. To the greatest possible extent, the Commission should instead "rely on market forces to stimulate the captioning or video description of library product at the rate at which the American public -- through their own choices -- deems captioned or described product to be necessary or desirable."¹⁷

Further, Commission forbearance from enacting requirements that all library product be closed captioned is consistent with the telecommunications legislation just enacted by Congress. The legislation provides that the Commission should "maximize the accessibility" of previously exhibited programming. Congress clearly stated its intent that no captioning requirement should result in previously published programming not being aired because of the cost of captioning. Where demand exists for the captioning of previously released products, the industry will continue to meet that demand.

2. Interstitial Material

HBO reiterates its belief that interstitial material should be exempt from mandatory closed captioning. The interstitial material on the HBO and Cinemax networks consists of a high volume of promotional and other material

¹⁷ Comments of MPAA at 11.

that is programmed between the feature presentations.¹⁸ Moreover, because of its promotional nature, much of the interstitial programming is produced within a tight time-frame and has an extremely short shelf life. Finally, interstitial material usually contains on-screen graphics that provide the same information that is contained in the program audio. In other words, in most instances, hearing impaired individuals have access to the same information contained in the audio portion of the interstitial material, even though the information is provided through graphics rather than through closed captioning. Thus, the benefits of captioning this type of programming are minimal, if any, while the burdens, given the costs, quick turnaround, and the life of the product, are substantial.

3. Live Programming

As evident from the record in this proceeding, high quality captioning of live programming requires highly skilled captioners which are not available today in sufficient numbers to respond to a broad requirement that live programming be captioned.¹⁹ For example, the National

¹⁸ In fact, premium cable services carry a higher volume of this type of material than do broadcasters, for example, because pay cable services do not air commercial advertisements between programs.

¹⁹ See Comments of WGBH at 19 ("there is a shortage of trained stenocaptioners"); Comments of the National Captioning Institute at 5-6 (it takes six months to train even a person who is already expert in court reporting to be able to perform on-line captioning).

Captioning Institute ("NCI") states that "the supply of personnel with [this type] of training is limited, and significant amounts of on-line captioning services cannot normally be supplied on short notice."²⁰ HBO submits, therefore, that the marketplace will respond to live program captioning, but such captioning needs to be phased in as the marketplace develops, not by regulatory mandate.

III. VIDEO DESCRIPTION

The record in this proceeding amply demonstrates that it would be premature for the Commission to establish any requirements mandating the provision of video description services at this time. As the majority of commenters indicate, the unknown marketplace demand for, and the technical complexities of video description make regulatory requirements in this area completely unworkable for the present.²¹ Most notably, video description services currently compete with other enhancements, including foreign language programming, for use of the Second Audio Program ("SAP") channel.

While HBO concurs with those parties who suggest that increased opportunities for video description will occur

²⁰ Comments of NCI at 5-6.

²¹ See, e.g., Comments of CBS, Inc. at 38-39; Comments of NBC at 19; Comments of National Cable Television Association at 13; Comments of National Association of Broadcasters at 12-13.

after the conversion to digital transmission, HBO cautions that the advent of digital television will not completely remove certain of the obstacles to video description which currently exist. While the conversion to digital may provide more capacity to provide enhancements like video description, that capacity still will not be unlimited.

For example a digital transmission would typically be accompanied by four audio channels. A provider might decide to use two of those channels to provide stereo audio for its main language, and reserve two channels to provide audio in a foreign language or languages, depending upon consumer preference, thus precluding the ability to provide enhancements for which there is less demand.

The point is simply this -- while the advent of digital transmission perhaps will permit providers to offer additional enhancements to their services, digital technology will not offer them unlimited capacity in which to do so. Therefore, just as in the present analog environment, the use of any limited channel space for video description could require suspension of other transmissions, which might have greater public interest benefits. Any decisions regarding the provision of video description services, therefore, should involve an evaluation by the programming provider to determine what the needs of the television audience are and how best to meet them given available capacity.

IV. TECHNICAL AND QUALITY STANDARDS

Although a number of commenters in this proceeding point out that the quality of closed captioning currently provided often is less than perfect, HBO believes that the adoption of regulations governing technical and quality standards is unwarranted. In the same way consumers do not tolerate poor audio or video quality, they will not tolerate closed captioning that fails to meet acceptable standards. As has happened time and again with other enhancements to programming services, the marketplace will solve issues of quality and technical standards much more quickly and efficiently than government regulation. Further, as Media Captioning Services points out, there currently exist "adequate professional certifications for individuals entering the closed captioning industry," as well as "exhaustive guidelines developed by the Department of Education for evaluation and quality control assessment," thus vitiating the need for further regulation.²²

V. RETRANSMISSION

In its initial comments, HBO stated its belief that, unless the record in this proceeding establishes that redistributors routinely do not retransmit network-supplied closed captioning data, the Commission should refrain from

²² Comments of Media Captioning Services at ¶ 33.

adopting regulations governing the retransmissions of the captioning material made available by the program networks. HBO submits that the record does not contain evidence of widespread failure on the part of redistributors to retransmit closed captioning sufficient to warrant the imposition of onerous regulation. To the contrary, commenters such as the Satellite Broadcasting and Communications Association ("SBCA") assure the Commission that satellite redistributors retransmit closed captioning intact.²³ HBO submits that as marketplace forces will work to ensure retransmission of closed captioning, whether it be for the benefit of the distributor or through contract, the Commission should refrain from regulating this area.

VI. CONCLUSION

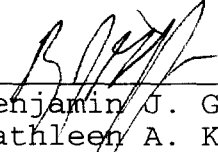
HBO concurs with the Commission's and Congress' findings that closed captioning and, to some degree, video description services serve the public interest by offering disabled Americans accessibility to the information, entertainment and cultural benefits offered by television. In fact, the video programming industry has responded to the need and demand for assistive services by vastly increasing the quantity and quality of closed captioned programming available to the public. Because the marketplace is working, there is no need for the Commission to adopt

²³ Comments of SBCA at 2.

inflexible closed captioning requirements that ignore the successful operation of the marketplace. Moreover, regulation of video description services would be unwarranted and premature.

Respectfully submitted,

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